



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

November 15, 1996

CERTIFIED MAIL #P 875 705 083

James Bartholome
Vice President Operations
Northwest Foam Products, Incorporated
2390 Rostron Circle
Twin Falls, Idaho 83301

RE: Northwest Foam Products (TF - Foam Products Manufacturing) - #9504-047-2
Tier II Operating Permit (#083-00063)

Dear Mr. Bartholome:

The Division of Environmental Quality (DEQ) received Northwest Foam Product's (Northwest Foam) Tier II Operating Permit (OP) application on December 22, 1995. On June 30, 1996, DEQ deemed Northwest Foam's application complete. On September 17, 1996, a proposed Tier II permit was issued for public comment. The public comment period was from October 1, 1996, through October 31, 1996. No comments were received.

Based on review of your application and state and federal rules and regulations, DEQ finds this project meets the Provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Therefore, I am pleased to enclose your Tier II OP (#083-00063) for the emission sources that exist at the facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

Please be advised that this operating permit is subject to permit application fees of five hundred dollars (\$500.00) in accordance with IDAPA 16.01.01.470. IDAPA 16.01.01.470 became effective on March 7, 1995. Information regarding the permit application fees will be sent to you shortly.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Martin Bauer, Chief, Air Quality Permitting Bureau, at (208) 373-0502.

Sincerely,

Orville D. Green
Assistant Administrator
Air & Hazardous Waste

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Enclosure

cc: D. Howard, Twin Falls Regional Office
Source File
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**STATE OF IDAHO
AIR POLLUTION
OPERATING PERMIT**

GENERAL INFORMATION

PERMIT NUMBER

0 8 3 - 0 0 0 6 3

AQCR

0 6 3

CLASS

A 2

SIC

3 0 8 6

ZONE

1 1

UTM COORDINATE (km)

7 1 0 5 4 7 1 3 2

1. PERMITTEE

Northwest Foam Products, Incorporated

2. PROJECT

Tier II Operating Permit

3. ADDRESS

2390 Rostron Circle

TELEPHONE #

(208) 734-7426

COUNTY

Twin Falls

4. CITY

Twin Falls

STATE

Idaho

ZIP CODE

83301

5. PERSON TO CONTACT

James Bartholome

TITLE

Vice President Operations

6. EXACT PLANT LOCATION

Longitude 114° 26' 15" Latitude 42° 32' 20"

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Manufacture Plastic Foam Products

8. GENERAL CONDITIONS

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEQ'S TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEPARTMENT REVIEW IN ACCORDANCE WITH Section 16.01.01.200 OF THE Rules for the Control of Air Pollution in Idaho.

David D. Green

ASSISTANT ADMINISTRATOR
DIVISION OF ENVIRONMENTAL QUALITY

ISSUED NOVEMBER 15, 1996

DATE

EXPIRES NOVEMBER 15, 2001

DATE

AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

PERMITTEE AND LOCATION

Northwest Foam Products, Incorporated
Tier II Operating Permit
Twin Falls, Idaho

083 - 00063

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

EPS Expansion

1. EMISSION LIMITS

- 1.1 Emissions of volatile organic compounds (VOC) shall not exceed the corresponding emission rate limits listed in Appendix A.
- 1.2 Visible emissions shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required in IDAPA 16.01.01.625. Opacity will be determined using DEQ's "Procedures Manual for Air Pollution Control".

2. OPERATING REQUIREMENTS

- 2.1 VOC content of EPS used in the process shall not exceed 15.3 tons per month. VOC content of EPS used in the process shall not exceed 105.9 tons per year.

3. MONITORING REQUIREMENTS

- 3.1 For each type of EPS bead used during each shift, the Permittee shall record the following:
- 3.1.1 The pounds of EPS beads used.
- 3.1.2 The percent VOC content by weight given in the Certificate of Analysis for the EPS bead used.
- 3.1.3 The calculated pounds of VOCs contained in the mass of EPS used using the following equation:

$$VOC_{each} = M_{EPS} * \%VOC_{EPS}, \text{ where}$$

$$VOC_{each} = \text{pounds (lbs) of VOC contained in the mass of EPS used;}$$

$$M_{EPS} = \text{pounds (lbs) of EPS used;}$$

$$\%VOC_{EPS} = \text{percent VOC content by weight given in the Certificate of Analysis for the EPS bead used}$$

- 3.2 The Permittee shall calculate the total pounds (lbs) of VOC contained in the mass of all types of EPS used for each day using the following equation:

$$\sum (VOC_{each}) = VOC_{each} + VOC_{each} + \dots \text{ where,}$$

$$\sum (VOC_{each}) = \text{total pounds of VOC contained in the pounds of EPS used for each shift (lbs VOC/shift)}$$

- 3.3 The Permittee shall record monthly the total pounds (lbs) of VOC contained in the mass of EPS used.
- 3.4 The Permittee shall calculate and record the twelve (12) month rolling total of VOCs contained in the pounds of EPS used. This value shall be calculated by totaling the most recent twelve (12) values recorded in Section 3.3 of this permit.

ISSUED: NOVEMBER 15, 1996
EXPIRES: NOVEMBER 15, 2001

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AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

Northwest Foam Products, Incorporated
Tier II Operating Permit
Twin Falls, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

EPS Expansion

4. REPORTING AND RECORDKEEPING REQUIREMENTS

The Permittee shall record, in a monthly report, the information requested in Section 3.1, 3.2, and 3.3 of this permit. This report shall be maintained on file by the Permittee for the most recent five (5) year period and made available to Department representatives upon request.

ISSUED:	NOVEMBER 15, 1996
EXPIRES:	NOVEMBER 15, 2001

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APPENDIX A

NORTHWEST FOAM PRODUCTS, INCORPORATED - TWIN FALLS

EMISSION LIMITS^a -- MONTHLY (lb/month) AND ANNUAL (ton/yr)

EMISSION UNIT DESCRIPTION	VOC	
	lb/mn	T/yr
Manufacturing Building	13	90

- a As determined by a pollutant specific promulgated U.S. EPA method, or Department approved alternative, or as determined by Department's emission estimation methods used in this permit analysis.

ISSUED: NOVEMBER 15, 1996
EXPIRES: NOVEMBER 15, 2001

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OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the **Rules for the Control of Air Pollution in Idaho**, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the **Rules for the Control of Air Pollution in Idaho**) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

ISSUED:	<u>NOVEMBER 15, 1996</u>
EXPIRES:	<u>NOVEMBER 15, 2001</u>

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- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with the Department's Procedures Manual for Air Pollution Control. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior Department approval.

The Permittee shall submit a test protocol and a proposed test date for each performance test required by this permit to the Department for approval at least thirty (30) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within forty-five (45) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

ISSUED:	<u>NOVEMBER 15, 1996</u>
EXPIRES:	<u>NOVEMBER 15, 2001</u>

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